

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
NORTHERN DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**Criminal No. CCB-20-0065**

**JESSE MEARS**

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**MOTION TO SUPPRESS STATEMENTS**

Jesse Mears, by and through his undersigned counsel, hereby moves this Honorable Court for an order suppressing any and all statements, admissions, and confessions allegedly given by the defendant, whether oral, written or otherwise recorded, which the government proposes to use as evidence against him. In support of this motion, Mr. Mears states the following:

1. Mr. Mears is charged in a one count indictment with being a Felon in Possession of a Firearm and Ammunition in violation of 18 U.S.C. § 922(g).

2. Mr. Mears was initially taken into custody after a vehicle stop on September 7, 2019. Following the vehicle stop, Baltimore City Police Officer James Scoglio questioned and elicited answers from Mr. Mears while at the scene before advising Mr. Mears of his right to counsel and his right to remain silent.

3. Any such statements, admissions, or confessions were obtained in violation of Mr. Mears' rights as guaranteed by the Fifth and Sixth Amendments to the United States Constitution.

4. Any statements, admissions, or confessions were obtained in violation of Mr. Mears' rights secured by the Supreme Court's holding in *Miranda v. Arizona*, 384 U.S. 436 (1965).

5. Any statements, admissions, or confessions made by Mr. Mears at the time of his arrest were involuntary.

6. Mr. Mears is entitled to a hearing on the voluntariness of any statements, admissions or confessions attributed to him, in accordance with the provisions of 18 U.S.C. § 3501 and the principles set forth in *United States v. Inman*, 352 F.2d 954 (4th Cir. 1965).

WHEREFORE, for the above reasons and for any other reasons which may appear to the Court, Mr. Mears moves that all statements, admissions or confessions that the government proposes to use as evidence against him, whether oral, written or otherwise recorded, be suppressed.

#### MEMORANDUM OF POINTS AND AUTHORITIES

1. Fifth Amendment to the United States Constitution.
2. Sixth Amendment to the United States Constitution.
3. *Miranda v. Arizona*, 384 U.S. 436 (1966).
4. *United States v. Inman*, 352 F.2d 954 (4th Cir. 1965).
5. 18 U.S.C. § 3501.

Respectfully submitted,

JAMES WYDA  
Federal Public Defender

/s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Motion was sent via CM/ECF to all  
counsel.

/s/

DAVID WALSH-LITTLE, #23586  
Assistant Federal Public Defender